

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	No. 09 CR 343
v.	)	
	)	Honorable Joan H. Lefkow
HEIDI W. FLANAGAN	)	

**MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE**

Defendant HEIDI W. FLANAGAN, by the Federal Defender Program and its attorney, MIANGEL CODY, respectfully requests that this Honorable Court enter an order terminating her supervision early. In further support, Ms. Flanagan states as follows:

1. On August 6, 2009, this Court sentenced Ms. Flanagan for a violation of 18 U.S.C. § 656, theft of bank funds. The Court imposed a sentence of one day's incarceration (time served), followed by two and one half years' supervised release. Without incident, Ms. Flanagan has served over one year of her supervised release. She now requests an early termination.

2. Since the commencement of her probation, Ms. Flanagan has been an exemplary supervisee, responsibly fulfilling every obligation imposed upon her by her Probation Officer. She has made timely court payments. She has maintained steady employment, successfully completed her court imposed obligations, and she has sustained no new arrests, cases or convictions.

3. Ms. Flanagan has complied with all of the conditions her probation, and has derived all of the benefits she can from his supervision. There is no further need for her to

remain supervised, and to do so would unnecessarily tax the valuable and limited resources of the United States Probation Office. She urges that the scarce resources of the United States Probation Office are better utilized upon those individuals more acutely in need of court supervision.

4. The United States Probation Office, through officer Jay Nichols, interposes no objection to this request.

WHEREFORE, for the above-noted reasons, Ms. Heidi Flanagan respectfully asks the Court to grant her motion for early termination of her supervision.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM  
Carol Brook  
Executive Director

By: /s/ MiAngel Cody  
*Counsel for Heidi Flanagan*  
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**CERTIFICATE OF SERVICE**

The undersigned, MiAngel Cody, an attorney with the Federal Defender Program, hereby certifies that the following document:

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was served on August 30, 2010, in accordance with Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), pursuant to the district court's ECF system as to ECF filers, and was sent by first class mail or by hand delivery to non-ECF filers, if any.

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